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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION

UNITED STATES OF AMERICA,) Case No. CR-14-00138 YRG
Plaintiff,)
v.) STIPULATION TO RESCHEDULE STATUS
CONSUELO PUENTE,) CONFERENCE AND TO EXCLUDE TIME
Defendant.) UNDER SPEEDY TRIAL ACT AND
) ORDER THEREON
)
)

For the reason that the defendant's counsel requires reasonable time allowing for continuity of counsel and for effective preparation, taking into account the exercise of due diligence, it is hereby stipulated by and between Plaintiff, the United States of America, and Defendant Consuelo Puente through their respective counsel, as follows:

1. That the status conference in this matter be rescheduled from September 11, 2014, to **October 30, 2014**, at 2:00 pm.

2. That the period of delay from September 11, 2014, **to October 30, 2014**, shall be excluded in accordance with the provisions of the Speedy Trial Act, 18 U.S.C. §§ 3161(h)(7)(A) and (h)(7)(B)(iv), as the ends of justice served by this exclusion allowing for continuity of counsel and for adequate trial preparation outweigh the best interest of the public and the Defendant in a speedy trial.

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1 Respectfully Submitted,

2 MELINDA HAAG
3 United States Attorney

4 /s/
5 ELLEN V. LEONIDA
6 Federal Public Defender
7 Attorney for Defendant
8 Consuelo Puente

9 /s/
10 THOMAS MOORE
11 Assistant United States Attorney
12 Chief, Tax Division

13 For the reasons stated by the parties in their stipulation, Court finds that the ends of justice served
14 by continuing the status conference to allow for effective preparation of counsel, taking into account the
15 exercise of due diligence, outweigh the best interest of the public and Defendant in a speedy trial
16 because additional time is required to allow for continuity of counsel and to allow Defendant Consuelo
17 Puente and her counsel adequate time for effective preparation.

18 IT IS ORDERED that the status conference scheduled for September 11, 2014, be rescheduled to
19 **October 30, 2014**, and that the period of delay from September 11, 2014, through **October 30, 2014**,
20 shall be excluded in accordance with the provisions for the Speedy Trial Act, 18 U.S.C. §§
21 3161(h)(7)(A) and (h)(7)(B)(iv), as the ends of justice served by this continuance allowing for continuity
22 of counsel and for adequate preparation outweigh the best interest of the public and Defendant in a
23 speedy trial.

24 PURSUANT TO STIPULATION, IT IS SO ORDERED.

25 Dated: September 10, 2014

26 
27 YVONNE GONZALEZ ROGERS
28 UNITED STATES DISTRICT JUDGE